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Attorneys for Defendant  
DEBT RESOLUTION DIRECT, LLC

**UNITED STATES BANKRUPTCY COURT**  
**CENTRAL DISTRICT OF CALIFORNIA – SANTA ANA DIVISION**

In re:  
THE LITIGATION PRACTICE GROUP  
P.C.,  
Debtor,

RICHARD A. MARSHACK, Chapter 11  
Trustee, for The Bankruptcy Estate of  
Litigation Practice Group P.C. and  
Liquidating Trustee of the LPG  
Liquidation Trust,

Plaintiff,

v.

DEBT RESOLUTION DIRECT, LLC  
AND DAVID JOHN ILLNICKI,

Defendants.

Case No.: 8:23-bk-10571-SC

Chapter 11

Adv. Proc. No.: 8:24-ap-01149

**JOINT STIPULATION TO  
EXTEND DEFENDANT DEBT  
RESOLUTION DIRECT, LLC'S  
TIME TO ANSWER PLAINTIFF'S  
COMPLAINT**

Complaint Served: November 22, 2024

Response Date (after multiple  
extensions): April 18, 2025

Proposed Response Date: May 19,  
2025

[NO HEARING REQUIRED]

**TO THE HONORABLE COURT:**

Plaintiff RICHARD A. MARSHACK, Chapter 11 Trustee, for The  
Bankruptcy Estate of The Litigation Practice Group P.C. and Liquidating Trustee of  
the LPG Liquidation Trust ("Plaintiff") and Defendant DEBT RESOLUTION  
DIRECT, LLC ("DRD") (collectively, the "Parties"), by and through their

undersigned counsel of record, hereby agree to enter into the following Joint  
Stipulation to extend DRD's time to respond to the Complaint (the "Complaint"):

WHEREAS, Plaintiff filed the Complaint on November 22, 2024 and initiated  
the above-captioned adversary proceeding;

WHEREAS, pursuant to this Court's Summons and Notice of Status  
Conference in Adversary Proceeding [LBR 7004-1], DRD's initial responsive  
pleading deadline was December 23, 2024;

WHEREAS, the Parties' respective counsel met and conferred and stipulated  
to an initial extension of time of twenty-eight (28) days, until January 20, 2025, for  
DRD to respond to the Complaint;

WHEREAS, the Parties' respective counsel met and conferred and stipulated  
further to a second extension of time of twenty-eight (28) days, until February 17,  
2025, for DRD to respond to the Complaint;

WHEREAS, the Parties' respective counsel met and conferred and stipulated  
further to a third extension of time of thirty (30) days, until March 19, 2025, for DRD  
to respond to the Complaint;

WHEREAS, the Parties' respective counsel met and conferred and stipulated  
further to a fourth extension of time of thirty (30) days, until April 18, 2025, for DRD  
to respond to the Complaint;

WHEREAS, although the Parties agreed that the fourth extension would be the  
final extension, Plaintiff filed a second Complaint (the "Second Complaint") with one  
cause of action for aiding and abetting a fraudulent transfers on March 17, 2025,  
against Matthew Clegg, Richard Senitte, and David Nearing, who were principals of  
MRD Marketing LLC ("MRD"), and, in the case of Senitte and Clegg, also principals  
of DRD;

WHEREAS, due to the intervening event of Plaintiff filing the Second  
Complaint, the Parties met and conferred and stipulated further to a fifth extension of

time of thirty-one (31) days (Federal Rule of Bankruptcy Procedure Rule 9006(c) mandates that if the last day of a deadline falls on a Sunday, which is the case here, the period continues to run until the end of the next day), until May 19, 2025, for DRD to respond to the Complaint;

WHEREAS, this extension is not requested for any improper purpose and will not cause any party to suffer prejudice;

**THEREFORE, IT IS HEREBY STIPULATED AND AGREED**, by and through the Parties' respective undersigned counsel, that DRD's deadline to move to dismiss, answer or otherwise respond to Plaintiff's Complaint shall be extended to and including May 19, 2025;

**IT IS SO STIPULATED.**

Dated: April 18, 2025

DINSMORE & SHOHL LLP

By: /s/ Sarah Mattingly

Sarah Mattingly

Attorney for Plaintiff

Richard A. Marshack

Dated: April 18, 2025

COZEN O'CONNOR

By: /s/ Matthew S. Steinberg

Matthew S. Steinberg

Brian L. Shaw

Brandon Posivak

Attorneys for Defendant

DEBT RESOLUTION DIRECT, LLC

All signatories listed, and on whose behalf the filing is submitted, concur in the filing's content and have authorized the filing.

Dated: April 18, 2025

By: /s/ Matthew S. Steinberg

Matthew S. Steinberg